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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:20-cv-08570-JD

**STIPULATION AND [PROPOSED]  
ORDER RE AUTHENTICITY OF  
DOCUMENTS**

Hon. James Donato

1 In order to avoid needless deposition examination and other discovery, Advertiser  
2 Plaintiffs, Consumer Plaintiffs, and Defendant Meta Platforms, Inc. (“Party” or “Parties”), hereby  
3 stipulate and agree as follows:

4 1) Except as otherwise provided in paragraphs 3, 4, and 5 below, the Parties agree  
5 that, for the purposes of Rule 901 of the Federal Rules of Evidence, they will not object on  
6 authenticity grounds to any document or thing produced from the files of a Party bearing such  
7 Party’s Bates numbers and produced in response to another Party’s discovery requests in this  
8 litigation, including such documents originally produced from that Party’s files to the Federal  
9 Trade Commission or other governmental authorities.

10 2) Except as otherwise provided in paragraphs 3, 4, and 5 below, the Parties agree  
11 that, for the purposes of Rule 901 of the Federal Rules of Evidence, they will not object on  
12 authenticity grounds to any document or thing produced from the files of a Non-Party in this  
13 litigation.

14 3) The agreements in Paragraphs 1 and 2 do not apply to handwritten notes or  
15 documents. If a document or thing produced by a Party bears handwritten notes, the Parties’  
16 agreement does not apply to the handwritten portion of the document but does apply to the  
17 remainder of the document or thing.

18 4) If a Party has a good-faith belief based upon evidence that a document or thing  
19 listed on another Party’s exhibit list is not what it purports to be, or that a specific document  
20 includes pages that are not part of the document, the Party shall advise the other side of that  
21 challenge after receipt of the other side’s proposed exhibit list for trial. The Parties will negotiate  
22 in good faith to resolve such an objection. In the event that a good-faith dispute arises regarding  
23 the authenticity of a document or thing, the Parties agree to meet and confer in good faith promptly  
24 about the authenticity of such document(s) and thing(s), and, if necessary, to expedite any related  
25 motions for resolution by the Court. In the event that a good-faith dispute arises, the Parties agree  
26 that they will not object to reasonable, good-faith efforts to establish authenticity of contested  
27 documents on the basis of timeliness.

28 5) Nothing in this Stipulation establishes the admissibility of any document nor shall

it be taken to mean that any Party has accepted any characterization other than those to which the parties have specifically stipulated. The Parties hereby expressly reserve the right to object to the admissibility of any document or thing under any grounds permitted by law and not expressly addressed herein.

Dated: April 25, 2023

Respectfully submitted,

By: /s/ Shana E. Scarlett

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**FILER ATTESTATION**

I am the ECF user who is filing this document. Pursuant to Civil L.R. 5-1(h)(3), I hereby attest that each of the other signatories have concurred in the filing of the document.

Dated: April 25, 2023

By: /s/ Brian J. Dunne  
Brian J. Dunne

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
JAMES DONATO  
United States District Judge